

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|-----------------|---|------------------------|
| IN RE: | : | |
| Patricia Grasty | : | Chapter 13 |
| | : | Case No.: 22-11209-MDC |
| Debtor. | : | |

**EXPEDITED MOTION TO SELL REAL PROPERTY
FREE AND CLEAR OF LIENS AND ENCUMBRANCES**

Patricia Grasty (the “Debtor”), by and through their undersigned counsel, hereby move this Honorable Court to Sell their Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code and in support thereof aver the following:

1. The Debtor filed the Chapter 13 Bankruptcy Petition on May 10, 2022.
2. The subject real property is located at 1566 Pospect Avenue Willow Grove, Pennsylvania 19090 (the “Property”).
3. The Debtor owns a one-half (1/2) interest in the Property.
4. The Debtor believes it to be in their best financial interest to sell the property.
5. In furtherance of the sale, the Debtor retained the services of Earlene Gaskins of New Horizons Real Estate, Inc.
6. On or about May 8, 2023, Debtor by and through their realtor, entered into an Agreement of Sale of the property in the amount of \$215,000.00. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**
7. The settlement date for the sale of the subject property is scheduled for May 30, 2023, and accordingly, an expedited hearing is requested in this matter.

8. The buyer, Valery Yakovich, is not an insider of the Debtor and the sale represents an arms-length transaction between the parties, made without fraud and/or collusion.

9. The Debtor is desirous of receiving the total exemption in the sum of \$27,900.00 from their portion of the sale proceeds plus any sums remaining after all claims are satisfied.

10. Any remaining proceeds after the Debtor's exemption shall be paid to and distributed by the chapter 13 trustee.

WHEREFORE, Debtors, by and through the undersigned counsel, respectfully request this Honorable Court to enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtor to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the Debtor such other and further relief to which they may be justly entitled.

Dated: May 15, 2023

/s/Brad J. Sadek, Esq

Attorney for Debtor
Sadek Law Offices
Two Penn Center
1500 JFK Boulevard, Suite 220
Philadelphia, PA 19102
215-545-0008